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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

- ☐ Affects PG&E Corporation
- ☐ Affects Pacific Gas and Electric Company
- ☒ Affects both Debtors

** All papers shall be filed in the Lead Case.
No. 19-30088 (DM)*

**STIPULATION BETWEEN OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS AND OFFICIAL
COMMITTEE OF TORT CLAIMANTS
EXTENDING TIME TO RESPOND TO
MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
FOR ENTRY OF AN ORDER APPROVING
PROPOSED MODEL PROOF OF CLAIM
FORM FOR FIRE CLAIMS AND
RELATED PROCEDURES [DOCKET NO.
1824]**

[No Hearing Requested]

1 This stipulation and agreement for order (the “Stipulation”) is entered into by the
2 (i) Official Committee of Unsecured Creditors (the “UCC”) appointed in the jointly administered
3 chapter 11 cases (the “Chapter 11 Cases”) of the above-captioned debtors in possession, on the
4 one hand; and (ii) Official Committee of Tort Claimants appointed in the Chapter 11 Cases (the
5 “TCC” and together with the UCC, the “Parties”), on the other hand. The Parties hereby stipulate
6 and agree as follows:

7 **RECITALS**

8 A. On May 3, 2019, the TCC filed the *Motion of the Official Committee of Tort*
9 *Claimants Pursuant to 11 U.S.C. §§ 105(a) and 501 and Fed. R. Bankr. P. 3001(a) for Entry of an*
10 *Order Approving Proposed Model Proof of Claim Form for Fire Claims and Related Procedures*
11 [Docket No. 1824] (the “Motion”), which is set for hearing before the Court at 9:30 a.m. (Pacific
12 Time) on June 11, 2019. Any response or opposition to the Motion is due by 4:00 p.m. (Pacific
13 Time) on May 28, 2019.

14 B. Counsel to the UCC has requested, and counsel to the TCC has agreed, that the time
15 for the UCC to respond to the Motion be extended.

16
17 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
18 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
19 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH**
20 **THE UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT**
TO ORDER, THAT:

21 1. The time for the UCC to file and serve any response or opposition to the Motion is
22 extended through 4:00 p.m. (Pacific Time) on May 31, 2019.

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24 [Signatures on next page]
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Dated: May 22, 2019

MILBANK LLP

/s/ Thomas R. Kreller

Thomas R. Kreller

*Attorneys for Official Committee of
Unsecured Creditors*

Dated: May 22, 2019

BAKER & HOSTETLER LLP

/s/ Eric R. Goodman

Eric R. Goodman

*Attorneys for Official Committee of
Tort Claimants*